

JANEE HUNTER,

Plaintiff,

VS.

KILILO KIJAKAZI,  
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01534-DJA

**UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE RESPONSE TO MOTION TO  
REMAND**

***(FIRST REQUEST)***

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by  
 2 and through her undersigned attorneys, hereby moves for a 59-day extension of time to file her response  
 3 to Plaintiff’s motion to remand. The answering brief is due to be filed by January 17, 2023. This is the  
 4 Commissioner’s first request for an extension of time to file the response.

5 Defendant submits that good cause exists for this extension request because the attorney tasked  
 6 with writing the response has several concurrent deadlines, and needs sufficient time to review the  
 7 record, evaluate the issues raised in Plaintiff’s motion to remand, and prepare Defendant’s response.  
 8 Defendant’s counsel will endeavor to complete these tasks as soon as possible. This request is made in  
 9 good faith and with no intention to unduly delay the proceedings, and counsel apologizes for any  
 10 inconvenience. Accordingly, Defendant requests an extension in which to respond to file the response  
 11 until March 17, 2023.

12 The undersigned conferred with Plaintiff’s counsel, who confirmed on January 9, 2023, that  
 13 Plaintiff has no objection to the requested extension.

14 It is therefore respectfully requested that Defendant be granted an extension of time to file the  
 15 response to Plaintiff’s motion to remand, through and including March 17, 2023.

16  
 17 Dated: January 9, 2023

JASON M. FRIERSON  
 United States Attorney

19 /s/ Michonne L. Omo  
 20 MICHONNE L. OMO  
 21 Special Assistant United States Attorney

22  
 23 IT IS SO ORDERED:

24   
 25 UNITED STATES MAGISTRATE JUDGE

26 DATED: January 10, 2023

**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO MOTION TO REMAND** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

**Leonard Stone**

lstone@shookandstone.com

**Marc V. Kalagian**

marc.kalagian@rksslaw.com

Attorneys for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 9, 2023

/s/ Michonne L. Omo

MICHONNE L. OMO

Special Assistant United States Attorney